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- J CLOSED
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EG&G ROCKY FLATS, INC.

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Lisa L. O'Mary Program Analyst Program Division DOE, RFFO

June 29, 1995

ADMINISTRATIVE RECORD DATA SAMPLING ISSUES - ALS-086-95

I propose two solutions that will resolve issues and facilitate the ongoing process of compiling and completing the Administrative Record. Both issues deal with data validation records which are mandated by the Environmental Protection Agency document, OSWER Directive No. 9833.3A-1, for inclusion in the Administrative Record.

Issue 1: In order to save on expenses for laboratory analysis, samples are batched before being sent to the labs. The result is that samples from more than one Operable Unit may appear on one data summary sheet. This presents two major problems in compiling Administrative Records. The most important problem is that of public access and understanding. Although the data summary sheets list the sample numbers which can be tied back to an Operable Unit, hundreds of summary sheets would present a confusing assembly of data. The second problem is that of physically including the data summary sheets in the appropriate Administrative Record files. Since the summary sheets may be included in multiple Administrative Record files, multiple copies would have to be made of thousands of summary sheets.

I believe the most sensible solution would be to generate reports from the Rocky Flats Environmental Database System (RFEDS). These reports would include the data that is represented on the data summary sheets, but would have the advantage of including only the sampling data appropriate for that Administrative Record file. The Administrative Record index would then reference the actual data summary sheets and the verified sampling data and chain of custody forms. The result would be improved accessibility to the sampling data, as well as cost savings to the Administrative Record Program.

To implement this solution we would ensure that all pertinent data on the summary sheets appears on the data summary reports and that the Administrative Record index contains references to:

Data summary sheets Verified sampling data Chain-of-custody forms.

Issue 2: It has been recognized that there are problems with the traceability, representation, and validity of older sampling data. This shortcoming was highlighted in the December 1994 Data Quality Investigation report. Currently, there is no demarcation between this problematic data, and therefore, we recommend that June 28, 1991, be used as the separation date. This is the date the Environmental Restoration Quality Assurance Program was approved by the Department of Energy. Sample data before this date would not be disregarded, but would be given less weight than data generated after this time. Earlier data would have indicator value only, while later data may be relied on as part of the decision selection process.

ADMIN RECORD

DOCUMENT CLASSIFICATION
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Lisa L. O'Mary 95-RF-05495 June 29, 1995 Page 2

We will proceed with these proposed solutions unless we hear further communication from you. Should you have questions, please call L. L. Tyler, extension 6936.

A. L. Stevens

Administrative Record Coordinator Environmental Documentation EG&G Rocky Flats, Inc.

ALS:ges

Orig. and 1 cc - L. L. O'Mary